

ERIC GRANT
United States Attorney
COLLEEN M. KENNEDY
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for the United States

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOAN RUBINGER,

Defendant.

Case No. 2:25-cv-00091-DAD-JDP

STIPULATED REQUEST AND
[PROPOSED] ORDER TO EXTEND
DEADLINE TO FINALIZE SETTLEMENT
AGREEMENT

1 Plaintiff the United States and Defendant Joan Rubinger (collectively, “the Parties”), by
2 and through their respective undersigned counsel, enter into the following stipulation to continue
3 the deadline set by the Court for the Parties to finalize the “long form settlement agreement”
4 memorializing the Parties’ resolution of this matter.

5 WHEREAS, at the conclusion of the settlement conference held on November 4, 2025,
6 with Magistrate Judge Jeremy D. Peterson, the Parties reached an agreement in principle as to a
7 proposed resolution of this case, subject to final approval by the necessary officials within the
8 U.S. Department of Justice;

9 WHEREAS, the Court ordered the parties to finalize their settlement agreement within 30
10 days of that date, or by December 4, 2025 (ECF 19);

11 WHEREAS, despite the Parties’ diligent efforts to finalize the agreement, the Parties will
12 be unable to do so by December 4, 2025; and

13 WHEREAS, the Parties believe they will be able to finalize their settlement agreement,
14 including obtaining final approval by the Department of Justice, by January 5, 2026;

15 Accordingly, the Parties respectfully request that the Court’s deadline to finalize the
16 settlement agreement in this matter be continued by approximately one month, to January 5,
17 2026. A proposed Order is provided for the Court’s convenience.

18 Respectfully submitted,

19
20 Dated: December 2, 2025

ERIC GRANT
United States Attorney

21
22 */s/ Colleen M. Kennedy*
23 COLLEEN M. KENNEDY
Assistant United States Attorney

24 *Attorneys for the United States*
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26
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Dated: December 2, 2025

BYRNE & NIXON LLP

/s/ Jennifer L. Derwin

MARK A. BYRNE

JENNIFER L. DERWIN

Counsel for Defendant Joan Rubinger

[PROPOSED] ORDER

Pursuant to the Stipulation of the Parties and good cause appearing, the deadline for the Parties to finalize the long form settlement agreement memorializing the Parties' resolution of this matter is hereby continued to January 5, 2026.

IT IS SO ORDERED.

DATED: December 2, 2025


JEREMY D. PETERSON
United States Magistrate Judge